



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 19, 2012

RE: LAKE COUNTY
VILLAGE OF MADISON
MADISON ELEMMENTARY SCHOOL
CONSTRUCTION STORM WATER
PERMIT NO: 3GC05571

Mr. Paul Romanic
Madison Local Schools
6741 N Ridge Road
Madison, OH 44057

Dear Mr. Romanic:

On July 12, 2012, I performed a compliance inspection for storm water best management practices (BMPs) at the above referenced site. I was accompanied by Dan Bogoevski of our Division of Surface Water, and John Bernot, Construction Manager for URS. While on site we met with Gary Roby, Superintendent of the site with Hammond Construction. Our records indicate that Madison Local Schools has obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05571*AG.

After review of the site and Storm Water Pollution Prevention Plan (SWP3), I noted the following deficiencies of the NPDES permit:

1. The ST-1's outlet was not built per plan. Two types of stone should be used to create a saddle-shaped outlet. Please build this outlet per plan.
2. Concrete washings have been dumped onto the ground. This material is not permitted to be discharged into offsite bodies of water or the storm sewer. Please clean this up and direct all concrete washings to the provided concrete washout pit.
3. Mortar is being washed out onto the ground. This liquid is flowing to the large puddles on site. This material is also not permitted to be discharged into offsite bodies of water or the storm sewer. Please clean up this area and dispose of the waste properly. A berm or trench should be built around this area to contain the wash water and mortar.
4. There is a large oil spill on site. All contaminated soils must be disposed of in a solid waste dumpster. To prevent spills from occurring, regular checks of equipment should be done to ensure proper functioning. If a leak is inevitable, a drip pan should be placed underneath the equipment to contain the oil.
5. The fuel containment dyke is missing the plug. Please replace the missing plug to ensure a sealed container.
6. The silt fence on the west side of the west side of the site is not trenched and backfilled. Since this area is next to a stream, it is important that this fence functions properly.
7. Seeding has taken place on all soil left undisturbed for more than 21 days. However, due to the hot, dry weather, the seed has not taken fully. Watering of the seed may be required to achieve germination and subsequent grass growth. If 70% growth density is still not achieved, seeding and mulching may need to occur again.

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Post-Construction Concerns

Ohio EPA also reviewed the SWP3 for compliance with the post-construction requirements contained in Part III.G.2.e of the NPDES permit. Unfortunately, the information obtained from Hammond Construction is inadequate to demonstrate compliance with these requirements. We offer the following comments on the permanent BMPs for this site:

- It appears that the permanent basin is intended to be a dry extended detention basin. In order to satisfy the requirements of the NPDES permit, dry extended detention basins must provide a forebay and micropool, each a minimum of 10% of the WQv. The basin depicted on the SWP3 does not provide a micropool. The SWP3 must be amended and the basin built to meet NPDES requirements. Please review the enclosed specifications for dry extended detention basins from *Rainwater and Land Development, Ohio's Standards for Stormwater Management, Land Development and Urban Stream Protection* (Ohio Department of Natural Resources, 2006).
- The water quality orifice size is 4". This is too large for only the 3.54 acre drainage area this pond is taking in. A ½"-1" orifice would be more likely. Please consult with your engineer to calculate the proper orifice size.

You are directed to provide me with a letter of response indicating the actions that you have taken or will take to address the deficiencies noted above. Include any amendments to the SWP3 with your response. Your response must be received **no later than August 1, 2012**. Failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.04 and 6111.07 and is punishable by fines.

If you have any questions, please contact me at (330) 963-1125 or by e-mail at Katie.Bowman@epa.state.oh.us.

Sincerely,



Katie Bowman
Assistant to the District Engineer
Division of Surface Water

KB:bo

attachments: Photos, *Rainwater and Land Development* manual pages

pc: John Bernot, Construction Manager, URS
Gary Roby, Superintendent, Hammond Construction
Sam Britton, Mayor, Village of Madison

INSPECTION PHOTOS

Madison Elementary School



Figure 1: ST-1's outlet not built per plan



Figure 2: Pond-1 has no skimmer in place



Figures 3&4: Concrete washings being dumped on the ground



Figure 5: Mortar mixings being washed out onto the ground



Figure 6: Cloudy water next to the mortar mixing area



Figure 7: Oil spilled onto the ground



Figure 8: Fuel containment dyke missing the plug



Figure 9: Silt fence not trenched and backfilled



Figures 10&11: Areas where watering or reseeding need to occur